

Verified Complaint

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF SOUTH CAROLINA – COLUMBIA DIVISION

RCVD - USDC COLA SC
JUN 24 '25 PM 3:06

Miyuki Maureen Johnson, Trustee for

MMJ Enterprise Foreign Express Trust,

Civil Action No. 3:25-cv-06163-JFA-SVH

Plaintiff,

v.

Credit Acceptance Corporation,

Defendant.

COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF

Plaintiff, Miyuki Maureen Johnson, acting as Trustee for the MMJ Enterprise Foreign Express Trust, files this Verified Complaint against Credit Acceptance Corporation, and alleges as follows:

1. Plaintiff is the duly appointed Trustee of the MMJ Enterprise Foreign Express Trust, a private irrevocable trust entity with a principal address at 401 McNulty Street, STE #345, Blythewood, SC 29016.
2. Defendant Credit Acceptance Corporation is a financial institution or collections entity with a principal business address of 25505 W 12 Mile Rd, Southfield, MI 48034.

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3. On or about May to June 2025, Plaintiff submitted a lawful A4V (Accepted for Value) remittance and trust discharge package for account(s) under the trust. The remittance and accompanying enforcement materials were sent via certified mail and/or fax.

4. Defendant failed to respond within the 72-hour lawful response period or the 15-day rebuttal period required under commercial law, and in some cases continued collections or repossessions despite the discharge.

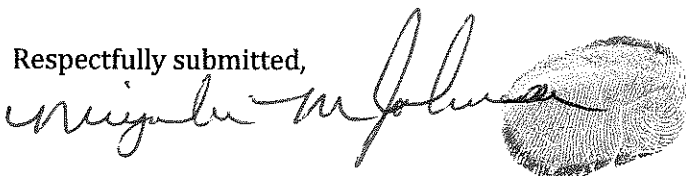
5. Defendant's continued dishonor and willful disregard of the A4V process constitutes a violation of Uniform Commercial Code sections 3-603 and 3-311 and constitutes fraud, coercion, emotional distress, and breach of fiduciary trust and civil rights.

6. Plaintiff is a disabled, retired federal employee, entitled to protection under the Americans with Disabilities Act (ADA), and should not have been subject to repeated harassment, threats, or property loss.

WHEREFORE, Plaintiff demands judgment against Defendant as follows:

- (a) For damages in the amount of \$100,000;
- (b) For injunctive relief to stop continued harassment or collections;
- (c) For costs of suit and court fees;
- (d) For all other relief the Court finds just and proper.

Respectfully submitted,



Miyuki Maureen Johnson

Trustee, MMJ Enterprise Foreign Express Trust

401 McNulty Street, STE #345

Blythewood, SC 29016

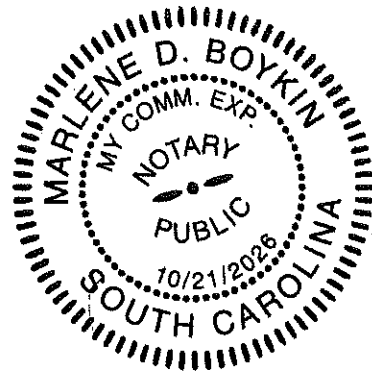
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Notary Acknowledgment

State of South Carolina

County of Richland

On this June 20, 2025, before me appeared Miyuki Maureen Johnson, known to me (or satisfactorily proven) to be the person whose name is subscribed to this instrument, and acknowledged that she executed it as Trustee of MMJ Enterprise Foreign Express Trust.

Notary Public: total *Marlene D. Boykin*My Commission Expires: 10/21/2026

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